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PROPOSED ATTORNEY FOR DEBTOR

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

IN RE	§	
	§	
TM EXPRESS, LLC	§	CASE 23-42338-11
	§	
DEBTOR	§	

EMERGENCY MOTION TO DISMISS

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, TM Express, LLC, Debtor in the above styled and numbered cause, and files this its Emergency Motion to Dismiss (“Motion”), and in support thereof would respectfully show unto the Court as follows:

1. Debtor filed this Chapter 11 proceeding on August 7, 2023.
2. The filing was made by mistake.
3. The Debtor entity did not intend to file the Chapter 11, there was a mis-communication between staff members at Debtor’s counsel’s office and the wrong case was filed.
4. Debtor does not intend to be in a bankruptcy proceeding and requests this

proceeding be dismissed.

WHEREFORE, PREMISES CONSIDERED, TM Express, LLC respectfully requests this case be dismissed, and for such other and further relief in law or in equity to which the debtor may show itself justly entitled.

Respectfully submitted,

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BY: /s/ Eric Liepins  
ERIC A. LIEPINS, SBN 12338110

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was sent to all creditors on this the 8<sup>th</sup> day of August 2023.

/s/ Eric Liepins  
Eric A. Liepins